

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation;
and VERA BRADLEY DESIGNS, INC. an
Indiana corporation,

Plaintiffs,

v.

WEI "TONY" JIANG, an individual;
DAIXIUZHEN DIAUXZHEN, an individual;
DAI XIUZHEN CO., an unknown entity; ZHU
YOUNG CHENG a/k/a "ZHU YONGCHENG,"
an individual; "ZHU YOUNGCHENG CO.," an
unknown entity; ZHENYAO YANG, an
individual; "ZHENYAO YANG CO.," an
unknown entity; YOKO NAKAMURA, an
individual; JUN FAN, an individual; AKIRA
NAKAMURA, an individual; LILI NELSON, an
individual; WENJUN SONG, an individual;
WENJUAN LIU, an individual; and JOHN
DOES 1-10,

Defendants.

No. 2:18-cv-00356-RSL

STIPULATED PERMANENT
INJUNCTION

STIPULATION

Plaintiffs Amazon.com, Inc. ("Amazon") and Vera Bradley Designs, Inc. ("Vera Bradley"), and Defendants Yoko Nakamura, Zhenyao Yang, Zhu Youngcheng, Jun Fan, Lili Nelson, Wenjun Song, Wenjuan Liu, Dai Xiuzhen, and Akira Nakamura (collectively, "Defendants"), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. The Court may enter the following permanent injunction.

STIPULATED PERMANENT INJUNCTION
(No. 2:18-cv-00356-RSL) - 1
4819-1403-5093v.1 0051461-001944

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DATED: May 7, 2019

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STIPULATED PERMANENT INJUNCTION
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PERMANENT INJUNCTION

Pursuant to the terms of the settlement agreement reached in this matter, including the parties' agreement to stipulate to a permanent injunction, IT IS HEREBY ORDERED that Defendants, their agents, representatives, employees, successors, and assigns are permanently enjoined and restrained from:

1. selling, offering for sale, advertising, marketing, shipping, transmitting, or distributing to Amazon, or to any other person or entity through any of Amazon's websites, any product or service;
2. applying for, opening, operating, controlling or using any Amazon seller or vendor account, or applying for or participating in any Amazon Affiliate Program;
3. manufacturing, distributing, offering to sell, or selling any product or service that incorporates Vera Bradley's brand, trademarks, or copyrights, or otherwise using Vera Bradley's brand, trademarks, or copyrights to manufacture, distribute, offer, or sell any product or service; and
4. assisting, aiding, or abetting any other person or entity in engaging in or performing any of the activities listed above.

IT IS SO ORDERED.

DATED: May 8, 2019


The Honorable Robert S. Lasnik
United States District Judge